

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

Pele IP Ownership LLC,

Plaintiff,

v.

Samsung Electronics Co., Ltd., and Samsung
Electronics America, Inc.,

Defendants.

Case No. 1:16-cv-03354

Honorable John J. Tharp Jr.

Magistrate Judge Sheila M. Finnegan

**JOINT MOTION TO EXTEND DISCOVERY DEADLINE AND
RESCHEDULE STATUS HEARING**

1. Defendants Samsung Electronics Co., Ltd. (“SEC”), and Samsung Electronics America, Inc. (“SEA” and together with SEC, “Samsung” or “Defendants”), by and through their counsel, Paul Hastings LLP, and with agreement from Pele IP Ownership LLC, by and through its counsel, Schiff Hardin LLP (“Plaintiff”, and collectively with the Defendants, the “Parties”) submit this joint motion to briefly extend the December 1, 2017 discovery deadline and reschedule the December 6, 2017 status hearing (the “Motion”). In support of this Motion, the Parties respectfully state as follows:

2. On August 30, 2017, the Court ordered that the Parties complete jurisdictional discovery by December 1, 2017. *See* Minute Entry, ECF No. 135. The Court also set the next status hearing for December 6, 2017. *Id.*

3. The Parties have worked diligently to conclude discovery within the prescribed discovery period. The Parties have conducted multiple depositions and have scheduled the deposition of SEA’s corporate representative under Federal Rule of Civil Procedure 30(b)(6) for November 21, 2017. The Parties had also scheduled the deposition of SEC’s corporate

representative under Federal Rule of Civil Procedure 30(b)(6) to take place in Seoul, Korea on November 29, 2017. However, subsequent to the scheduling of the SEC deposition, a conflict arose necessitating the resetting of that deposition. Due to pre-existing commitments of the Parties, including a trial set for early November, and in view of the several days required to travel to Seoul in order to prepare for and conduct the deposition, the Parties were unable to find an earlier date to reschedule the SEC 30(b)(6) deposition. The first date on which both the Parties and the SEC corporate representative are available for deposition is December 7 (Korea time). No further depositions or discovery is contemplated by the Parties in connection with the jurisdictional motion. Consequently, the Parties are seeking a brief extension of the discovery cut-off date by one week until December 8, 2017. Such an extension will not materially impact the future progression of the litigation.

4. Federal Rule of Civil Procedure 6(b)(1) permits the Court, for good cause, to extend the discovery deadline and adjourn the status hearing. Accordingly, and to accommodate the above request to reset the SEC deposition to December 7, 2017, the Parties seek a one-week extension of the deadline for jurisdictional discovery to December 8, 2017. The Parties further seek to reschedule the status hearing currently scheduled for December 6, 2017 at 9:00 a.m. to a date during the week of December 11, 2017 at 9:00 a.m., other than December 14 or 15, or to any date and time thereafter convenient for the Court. This is the Parties' first request for extension of the discovery cut-off date.

5. WHEREFORE, for the reasons set forth herein, the Parties respectfully request that this Court grant their Joint Motion to Extend Discovery Deadline and Reschedule Status Hearing.

Dated: October 19, 2017

/s/ Mark D. Pollack

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record for Defendants Samsung Electronics America, Inc., and Samsung Electronics Co., Ltd. hereby certifies that on October 19, 2017, he served a copy of the foregoing **JOINT MOTION TO EXTEND DISCOVERY DEADLINE AND ADJOURN STATUS HEARING** on counsel of record listed below by electronic means via the Electronic Case Filing (ECF) system:

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